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Attorneys at Law

MEMO ENDORSED

November 10, 2020

BY ECF

The Honorable Ona T. Wang
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Pavon *et al* v. Janon Electric Corp., *et al*.
Case No.: 20-cv-5899 (ALC) (OTW)

Dear Judge Wang:

SO ORDERED:

Application GRANTED. The conference is rescheduled for 1/19/21 at 4:30 p.m.



Ona T. Wang 11/17/20
United States Magistrate Judge

Along with the Law Offices of Fausto Zapata, I represent Plaintiffs in this matter. Mr. Zapata and I write jointly with Victor Anthony Carr, counsel for Defendants, to request an adjournment of the Initial Pretrial Conference and an extension of the time for the parties to submit the Proposed Scheduling Order.

As Your Honor may be aware, Judge Carter granted Plaintiffs' request for leave to file a motion for conditional certification in this wage and hour putative collective and class action. Plaintiffs filed the motion on November 4, 2020 and it should be fully submitted by December 4, 2020.

It is difficult for the parties to agree on the scope and timing of discovery until the Court decides the conditional certification motion. Accordingly, the parties propose that the Proposed Scheduling Order be due 14 days from the Court's decision on the motion and that the Conference be scheduled thereafter at the Court's convenience.

Alternatively, if Your Honor is not inclined to grant the above application, then the parties respectfully request a brief extension of time to file the Rule 26 Report and Proposed Case Management Plan.

Thank you for your consideration and attention to this matter.

Sincerely yours,

/s

Jason L. Solotaroff

cc: Fausto Zapata, Esq.
Victor Anthony Carr, Esq.